

02/19/2010 01:48 PM

more

---- Forwarded by Meredith Laws/DC/USEPA/US on 02/19/2010 01:48 PM -----

From: Kable Davis/DC/USEPA/US

To: Meredith Laws/DC/USEPA/US@EPA

02/19/2010 01:43 PM Date: Subject: clothianidin 6(a)(2) data

Meredith-

Attached below is the second bean I am sending to EFED. This is a 6(a)(2) submission, which is comprised of final results of the European study to evaluate significance of guttation to honey bee colony health.

Let me know if you have any questions.

Thanks...

Во

----- Forwarded by Kable Davis/DC/USEPA/US on 02/19/2010 01:38 PM -----

From: cts/cts/QP/USEPA/US

Kable Davis/DC/USEPA/US@EPA To:

Date: 02/19/2010 01:34 PM

Subject:

Please open the attached document. This document was digitally sent to you

using an HP Digital Sending device. [Untitled].pdf



Fw: clothianidin bee assessment 2009

Mark Corbin o Anita Pease

09/29/2010 12:17 PM

Cc: Thomas Steeger

History: This message has been replied to.

Tom

Do you have some time to discuss this?

Mark Corbin, Chief USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave., N.W., 7507P Washington, DC 20460

tele: 703-605-0033 fax: 703-305-6309

---- Forwarded by Mark Corbin/DC/USEPA/US on 09/29/2010 12:16 PM -----

From: William Eckel/DC/USEPA/US

To: Mark Corbin/DC/USEPA/US@EPA, Stephanie Syslo/DC/USEPA/US@EPA

Date: 09/29/2010 10:31 AM

Subject: clothianidin bee assessment 2009



Re: clothianidin bee assessment 2009



Mark Corbin o Thomas Steeger

09/29/2010 12:29 PM

History: This message has been replied to.

yes is in 6 now. you here next week? would like to get Anita up to speed on this (me also)

Given the recent discussion of the spiro's I thought you might have some insight.

Mark Corbin. Chief USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave., N.W., 7507P Washington, DC 20460

tele: 703-605-0033 fax: 703-305-6309

> **Thomas Steeger** Is this your chemical now? I have not seen this... 09/29/2010 12:25:27 PM

From: Thomas Steeger/DC/USEPA/US Mark Corbin/DC/USEPA/US@EPA To:

09/29/2010 12:25 PM Date:

Re: clothianidin bee assessment 2009 Subject:

Is this your chemical now? I have not seen this memo before now.

My first priority today is in helping Anita to get slides ready for the tomorrow's Bill Diamond briefing on common effects methods and the briefing slides for Steve B on atrazine ECO SAP study proposals.

Sent by EPA Wireless E-Mail Services.

Mark Corbin

---- Original Message -----From: Mark Corbin

Sent: 09/29/2010 12:17 PM EDT

To: Anita Pease Cc: Thomas Steeger

Subject: Fw: clothianidin bee assessment 2009

Tom

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Mark Corbin, Chief USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave., N.W., 7507P Washington, DC 20460 tele: 703-605-0033

fax: 703-305-6309

---- Forwarded by Mark Corbin/DC/USEPA/US on 09/29/2010 12:16 PM -----

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Mark Corbin/DC/USEPA/US@EPA, Stephanie Syslo/DC/USEPA/US@EPA To:

Date: 09/29/2010 10:31 AM

Subject: clothianidin bee assessment 2009

[attachment "044309 D370427 Bee Addendum.doc" deleted by Thomas Steeger/DC/USEPA/US]



Re: clothianidin bee assessment 2009

Mark Corbin o Thomas Steeger

09/29/2010 12:33 PM

good point. now put the blackberry away

Mark Corbin, Chief USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave., N.W., 7507P Washington, DC 20460

tele: 703-605-0033 fax: 703-305-6309

Thomas Steeger

Can you take more of my insights? -----

09/29/2010 12:32:36 PM

From: Thomas Steeger/DC/USEPA/US Mark Corbin/DC/USEPA/US@EPA To:

09/29/2010 12:32 PM Date:

Re: clothianidin bee assessment 2009 Subject:

Can you take more of my insights?

Sent by EPA Wireless E-Mail Services.

Mark Corbin

---- Original Message -----From: Mark Corbin

Sent: 09/29/2010 12:29 PM EDT

To: Thomas Steeger

Subject: Re: clothianidin bee assessment 2009

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09/29/2010 12:25:27 PM

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Subject: Fw: clothianidin bee assessment 2009

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tele: 703-605-0033 fax: 703-305-6309

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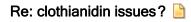
From: William Eckel/DC/USEPA/US

To: Mark Corbin/DC/USEPA/US@EPA, Stephanie Syslo/DC/USEPA/US@EPA

Date: 09/29/2010 10:31 AM

Subject: clothianidin bee assessment 2009

[attachment "044309 D370427 Bee Addendum.doc" deleted by Thomas Steeger/DC/USEPA/US]



Thomas Moriarty o davidmendesn

:

Cc: Thomas Steeger

History:

This message has been replied to.

Dave, I spoke with Dave H a bit ago. I spoke briefly with Tom S earlier today... I'm looking into the action will get back to you/Dave H tm

davidmendesn Hi Tom and Tom, We received this information t... 11/18/2010 12:08:19 PM

11/18/2010 12:55 PM

From:

To: Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA

Date: 11/18/2010 12:08 PM Subject: clothianidin issues?

Hi Tom and Tom,

We received this information today and would like to know what this means for the registration of clothinaidin on other crops, particularly corn. Could you please educate us?

Dave

[attachment "Clothianidiin cotton and mustard ruling" deleted by Thomas Moriarty/DC/USEPA/US]

Fw: request for meeting on clothianidin

Meredith Laws o Dr. Thomas Steeger

11/19/2010 09:54 AM

History:

This message has been replied to.

to -----Sent by EPA Wireless E-Mail Services.

Meredith Laws

---- Original Message ----From: Meredith Laws

Sent: 11/17/2010 03:24 PM EST

To: Mah Shamim

Cc: George Herndon; Venus Eagle; Kable Davis; Lois Rossi

Subject: request for meeting on clothianidin

Hi Mah:

We received the review dated 11/2/10 in which a honey bee field study for clothianidin was reclassified from Acceptable to Invalid (MRID 46907801). We would like to meet with you and discuss this. Some of our concerns and questions include:

- 1. On November 30, 2007, ie. 3 years ago, RD was informed the following: "This study is scientifically sound and satisfies the guideline requirements for a field toxicity test with honeybees (OPP Gdln. No. 141-5; OPPTS 850.3040). Now the study is reclassified to Invalid based on study design flaws and the guideline is reported as Not Satisfied. The reclassification directly conflicts with the original reviewer's conclusions on pages 30 31. Isn't there anything useful that EFED can derive from this study?
- 2. If the study had been determined to be invalid 3 years ago, would your conclusions have changed regarding the registration of clothianidin?
- 3. The field study was required as a condition of the original registration of clothianidin. Clothianidin was given a time-limited registration based on the need for this and other data. All data was submitted and found to be acceptable and we lifted the time-limit on the registration and converted it from "conditional" to an unconditional registration. The new review puts us in the position of having made the wrong decision on the registration.
- 4. This review says the study is Invalid but the November 2, 2010 (ie. same date) risk assessment for the mustard seed use says the study is Supplemental (see page 4). Which is correct?
- 5. Bayer is the registrant for the seed treatment products, 2 other companies have the foliar uses. Is the field study now a data gap that would need to be imposed on all the companies?
- 6. The Nov. 2 risk assessment lists a number of "outstanding data requirements." One of these is a seed leaching study and the reference is made to a study that is in-house and is currently in review (MRID 47483002). However, there was another study submitted, MRID 46826904, that was beaned to you on June 20, 2006. EFED closed it out with the classification "Extraneous Submission." I'm sorry, but I have no idea what that means. This study is not mentioned in the latest risk assessment and I have not found a review. Is EFED going to use it?

I have not gone through the entire risk assessment so we may have some additional questions. Bo Davis will be setting up a meeting. Although I am on detail to herbicides, I am still involved in bee issues.

thanks,

- Meredith

Meredith Laws, Acting Chief Herbicide Branch Registration Division Office of Pesticide Programs (703) 308-7038 http://www.epa.gov/pesticides

Fw: request for meeting on clothianidin

Meredith Laws o Dr. Thomas Steeger

11/19/2010 09:59 AM

Meredith Laws

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Sent: 11/17/2010 03:24 PM EST

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Cc: George Herndon; Venus Eagle; Kable Davis; Lois Rossi

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Meredith Laws, Acting Chief Herbicide Branch Registration Division Office of Pesticide Programs (703) 308-7038 http://www.epa.gov/pesticides



Jeff Anderson o Thomas Steeger, Thomas Moriarty

11/19/2010 04:13 PM

Cc: davidmendesn, buffybee, nhbabsellis, walker.honey, Gbrandi, badeehoney, jff2

History:

This message has been replied to.

Hi Tom and Tom

Dave Mendes forwarded your response (at the bottom) to the rest of the NHBAB. Dave is flying today, so I am taking the liberty of re asking the question. The following paragraph is excerpted from the document that Dave Mendes had attached.

"A previous field study (MRID 46907801/46907802) investigated the effects of clothianidin on whole hive parameters and was classified as acceptable. However, after another review of this field study in light of additional information, deficiencies were identified that render the study supplemental. It does not satisfy the guideline 850.3040, and another field study is needed to evaluate the effects of clothianidin on bees through contaminated pollen and nectar. Exposure through contaminated pollen and nectar and potential toxic effects therefore remain an uncertainty for pollinators."

MRID 46907801/46907802 is the Durpee pollinator core study which allowed full registration of clothianidin. As you will note in the paragraph, this study has been 'downgraded' from core to supplemental.

If the core study is no longer the core, does this alter the registration viability of other clothianidin uses? NHBAB believes that this question IS one that as leaders of EPA bee team you can answer, or research and answer.

Jeff Anderson NHBAB

----Original Message----

From: Steeger.Thomas@epamail.epa.gov

To:
Cc: Moriarty.Thomas@epamail.epa.gov

Sent: Fri, Nov 19, 2010 6:38 am Subject: Re: clothianidin issues? *Personal privacy information*

Dave,

You are asking a risk management decision and I am not a risk manager, nor am I familiar with the data used to support the assessment by Mr. Joe Decant in the Environmental Fate and Effects Division (EFED). However, the information in the EFED memo is not considered a "ruling", but rather a screening-level evaluation of potential [ecological] risks associated with the proposed uses of clothianidin. This evaluation is one of several which will be used by the Registration Division (RD) to render a decision under FIFRA, where risks are weighed against benefits. Based on the information in the EFED memo, the risk manager may ask for

additional refinements [beyond screening-level] or they may request additional data to address uncertainties identified in the assessment.

It is my understanding that Meredith Laws is on detail and a new risk manager is in the process of being assigned to the Insecticide Branch of the Registration Division. If you have questions regarding the risk management decision under consideration for clothianidin, those questions should be referred to George (Jeff) Herndon, who is the Associate Director of the Registration Division.

Tom

İ	*Personal privacy information*
_ 	
	 > To: >
_ 	 Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA
	 > Date: >
_ 	11/18/2010 12:08 PM
- 1	
- 	clothianidin issues?

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Tom

-	> From: >
	Personal privacy information
- !	
> ·	 Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA
>	

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>	
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Hi Tom and Tom,

We received this information today and would like to know what this means for the registration of clothinaidin on other crops, particularly corn. Could you please educate us?

Dave

[attachment "Clothianidiin cotton and mustard ruling" deleted by Thomas Steeger/DC/USEPA/US]





Thomas Moriarty

Jeff Anderson

Cc: Thomas Steeger

History:

This message has been forwarded.

Jeff.

I will look into this issue. I have read the memo but have not spoken with others to understand the reclassification.

Tom has given you a sense of the impact that the reclassification has on the scientific usefullness of the studv.

But I would like to have a better idea of the context of the re-review of this study.

I will look into this further (with Tom) to get back to you early next week.

Talk with you shortly,

tom m

-----Thomas Steeger/DC/USEPA/US wrote: -----

To: "Jeff Anderson" <jsa.cmhf@juno.com> From: Thomas Steeger/DC/USEPA/US

Date: 11/19/2010 05:25PM

Cc: Thomas Moriarty/DC/USEPA/US@EPA

Subject: Re: re: clothianidin issues?

Greetings Jeff,

The reclassification of a study from "core" to "supplemental" indicates that the study does not fulfill the guideline study requirement; as supplemental, the study would be still be considered scientifically sound though and could be used qualitatively in a risk assessment. Contrary to your statement, the decision to register a compound is not predicated on a single study, e.g., the soundness of a single field pollinator study. As I indicated earlier, the decision to register a compound is based on the assessment of a number of studies across many taxa which include humans, and the decision would [under the law] consider risks versus benefits. Therefore, in my opinion, the classification of the field pollinator study would not likely affect previous registration decisions especially given the fact that the pollinator study was simply reclassified as supplemental and is still considered to have utility for qualitatively assessing risk. As I also indicated earlier, you are asking risk management questions and my recommendation is that you direct the question to the risk managers associated with clothianidin; otherwise, you are simply stuck with my personal opinion.

I hope all is well with you.

----"Jeff Anderson" <jsa.cmhf@juno.com> wrote: -----

To: Thomas Steeger/DC/USEPA/US@EPA, Thomas Moriarty/DC/USEPA/US@EPA

From: "Jeff Anderson" < isa.cmhf@juno.com>

Date: 11/19/2010 04:10PM

*Personal Gbrandi@sbcglobal.net, *Personal Gbrandi@ Subject: Re: re: clothianidin issues?

*Personal *Personal

jff2@psu.edu

Personal privacy information

11/19/2010 08:50 PM

Hi Tom and Tom

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Tom

	> From:	
>-	>	
	>	
	Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA	
	 11/18/2010 12:08 PM >	
- 1	 > Subject: >	
	clothianidin issues?	
	Personal privacy info	rmation

----Original Message---From: Steeger.Thomas@epamail.epa.gov
To:
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Cc: Moriarty.Thomas@epamail.epa.gov Sent: Fri, Nov 19, 2010 6:38 am Subject: Re: clothianidin issues? Dave,

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Tom

> From:	
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> To:	l
Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EP	1
> Date:	
> 11/18/2010 12:08 PM >	

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Dave

[attachment "Clothianidiin cotton and mustard ruling" deleted by Thomas Steeger/DC/USEPA/US]





George Herndon o Thomas Steeger

11/22/2010 11:40 AM

Thanks.

----- Forwarded by Thomas Steeger/DC/USEPA/... **Thomas Steeger** 11/22/2010 11:22:09 AM

From: Thomas Steeger/DC/USEPA/US

George Herndon/DC/USEPA/US@EPA To:

Cc: Thomas Moriarty/DC/USEPA/US@EPA, Meredith Laws/DC/USEPA/US@EPA

Date: 11/22/2010 11:22 AM Subject: Fw: clothianidin issues?

---- Forwarded by Thomas Steeger/DC/USEPA/US on 11/22/2010 11:22 AM -----

From:

Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA To:

Date: 11/18/2010 12:08 PM clothianidin issues? Subject:

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[attachment "Clothianidiin cotton and mustard ruling" deleted by George Herndon/DC/USEPA/US]

Thomas Moriarty o George Herndon

Cc: Meredith Laws, Thomas Steeger, Venus Eagle

Jeff, Meredith, Venus,

Here is the article entitled "Pesticide Blow-out"

The article is mainly about clothianidin - the recharacterization of the study in 2004, and "EPA management" directing this recharacterization. The article case-studies clothianidin to say that EPA does not make decisions on sound science and that EPA therefore does not have knowledge of the effects [on the environment] that its decisions have on the environment.



Thomas Steeger ----

----- Forwarded by Thomas Steeger/DC/USEPA/...

11/22/2010 11:22:09 AM

From: Thomas Steeger/DC/USEPA/US
To: George Herndon/DC/USEPA/US@EPA

Cc: Thomas Moriarty/DC/USEPA/US@EPA, Meredith Laws/DC/USEPA/US@EPA

Date: 11/22/2010 11:22 AM Subject: Fw: clothianidin issues?

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[attachment "Clothianidiin cotton and mustard ruling" deleted by Thomas Moriarty/DC/USEPA/US]

11/22/2010 11:41 AM





Meredith Laws o Thomas Moriarty

11/22/2010 12:09 PM

Cc: George Herndon, Thomas Steeger, Venus Eagle

This talks about a review/re-characterization in 2003 and 2004 (and I don't even remember this happening). The issue we had last week was the 2007 review by Al Vaughan that was "Acceptable-Scientifically Sound" re-characterized to Invalid - or - Supplemental, depending on which memo you look at, on Nov. 2, 2010.

So it will appear externally that the latest was re-characterized as invalid but "management" made it be upgraded to supplemental. Very confusing overall, we look like idiots.

Thomas Moriarty Jeff, Meredith, Venus, Here is the article entitled... 11/22/2010 11:41:56 AM

From: Thomas Moriarty/DC/USEPA/US George Herndon/DC/USEPA/US@EPA To:

Meredith Laws/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA, Venus Cc:

Eagle/DC/USEPA/US@EPA

Date: 11/22/2010 11:41 AM Subject: Re: Fw: clothianidin issues?

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[attachment "PesticideBlowOut-1.pdf" deleted by Meredith Laws/DC/USEPA/US]

----- Forwarded by Thomas Steeger/DC/USEPA/... Thomas Steeger 11/22/2010 11:22:09 AM



Mark Corbin o Thomas Steeger, pease.anita

11/24/2010 03:30 PM

History:

This message has been replied to.

other than a name change this is the exact same document that Joe D sent to Tracking Team on November 2

Mark Corbin. Chief USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave., N.W., 7507P Washington, DC 20460

tele: 703-605-0033 fax: 703-305-6309

Thomas Steeger Sorry for the delay in sending this to you. The p... 11/24/2010 03:03:29 PM

From: Thomas Steeger/DC/USEPA/US Mah Shamim/DC/USEPA/US@EPA To: Anita Pease/DC/USEPA/US@EPA Cc:

11/24/2010 03:03 PM Date: Fw: clothianidin issues? Subject:

Sorry for the delay in sending this to you. The power was off at home last night (because of a squirrel) and it fell off my radar screen this morning.

Tom

---- Forwarded by Thomas Steeger/DC/USEPA/US on 11/24/2010 03:02 PM -----

From:

To: Thomas Moriarty/DC/USEPA/US@EPA, Thomas Steeger/DC/USEPA/US@EPA

11/18/2010 12:08 PM Date: clothianidin issues? Subject:

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[attachment "Clothianidiin cotton and mustard ruling" deleted by Mark Corbin/DC/USEPA/US]



clothianidin registration

Tom Theobald o Thomas Steeger

11/29/2010 08:02 AM

History:

This message has been replied to.

Tom,

Can you tell me when clothianidin was granted a full registration for seed treatment on corn and canola? Was there an EPA document which acknowleged the change from conditional to full registration, and if so, could you send me a copy? Thanks.

Tom Theobald



Re: clothianidin registration



Meredith Laws o Thomas Steeger

11/29/2010 03:45 PM

Cc: "Tom Theobald"

Dear Mr. Theobald:

Clothianidin was granted an unconditional registration for use as a seed treatment for corn and canola on April 22, 2010. EPA issued a new registration notice, there is no document that acknowledges the change from conditional to unconditional. This was a risk management decision based on the fulfillment of data requirements and reviews accepting or acknowledging the submittal of the data.

Meredith Laws, Acting Chief Herbicide Branch Registration Division Office of Pesticide Programs (703) 308-7038 http://www.epa.gov/pesticides

> **Thomas Steeger** Tom-- I do not know the registration history of cl... 11/29/2010 08:30:30 AM

Thomas Steeger/DC/USEPA/US From:

"Tom Theobald" <bkpr.tom@indra.com>, laws.meredith@epa.gov To:

Date: 11/29/2010 08:30 AM Subject: Re: clothianidin registration

Tom-- I do not know the registration history of clothianidin. I am forwarding your request to Meredith Laws who may be able to answer your question.

Tom

Sent by EPA Wireless E-Mail Services.

From: "Tom Theobald" [bkpr.tom@indra.com]

Sent: 11/29/2010 06:02 AM MST

To: Thomas Steeger

Subject: clothianidin registration

Tom.

Can you tell me when clothianidin was granted a full registration for seed treatment on corn and canola? Was there an EPA document which acknowleded the change from conditional to full registration, and if so, could you send me a copy? Thanks.

Tom Theobald



Fw: Press Release from Beekeepers & Enviros on - "Clothianidin's Faulty Registration"

Anita Pease o Joseph Decant, Mark Corbin, Thomas Steeger

12/08/2010 03:09 PM

fyi...

Anita Pease Senior Biologist USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave. NW (7507P) Washington, DC 20460

Phone: 703-305-0392 Fax: 703-305-6309

---- Forwarded by Anita Pease/DC/USEPA/US on 12/08/2010 03:08 PM -----

From: Christina Scheltema/DC/USEPA/US

To: Thomas Moriarty/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA, Meredith

Laws/DC/USEPA/US@EPA, Kimberly Nesci/DC/USEPA/US@EPA, Mark Suarez/DC/USEPA/US@EPA, Mary Clock-Rust/DC/USEPA/US@EPA, Tawanda Maignan/DC/USEPA/US@EPA, Claire Gesalman/DC/USEPA/US@EPA, Anita

Pease/DC/USEPA/US@EPA

Date: 12/08/2010 01:21 PM

Subject: Fw: Press Release from Beekeepers & Enviros on - "Clothianidin's Faulty Registration"

This is FYI only for now.

Christina Scheltema EPA's Office of Pesticide Programs phone (703)308-2201

----- Forwarded by Christina Scheltema/DC/USEPA/US on 12/08/2010 01:18 PM -----

From: "Kim Flottum" < Kim@BeeCulture.com>
To: Christina Scheltema/DC/USEPA/US@EPA

Date: 12/08/2010 12:16 PM

Subject: CATCH THE BUZZ - Clothianidin's Faulty Registration

This ezine is also available online at

http://home.ezezine.com/1636/1636-2010.12.08.12.17.archive.html

CATCH THE BUZZ

Press Release

In the July issue of *Bee Culture Magazine* there appeared an article by Tom Theobald detailing the fallacy of clothianidin registration in the U.S. That story is below. This article instigated several investigations by various concerned groups. The following Press Release is one result.

Heather Pilatic, Pesticide Action Network cell: 415.694.8596 Jay Feldman, Beyond Pesticides 202.543.5450, ext 15

Beekeepers Ask EPA to Remove Pesticide Linked to Colony Collapse Disorder, Citing Leaked Agency Memo

Pesticide Already Illegal in Germany, Italy & France Based on Scientific Findings SAN FRANCISCO and WASHINGTON, D.C. - Beekeepers and environmentalists today called on EPA to remove a pesticide linked to Colony Collapse Disorder (CCD), citing a leaked EPA memo that discloses a critically flawed scientific support study. The November 2nd memo identifies a core study underpinning the registration of the insecticide clothianidin as unsound after EPA quietly re-evaluated the pesticide just as it was getting ready to allow a further expansion of its use.

Clothianidin (product name "Poncho") has been widely used as a seed treatment on many of the country's major crops for eight growing seasons under a "conditional registration" granted while EPA waited for Bayer Crop Science, the pesticide's maker, to conduct a field study assessing the insecticide's threat to bee colony health. Bayer's field study was the contingency on which clothianidin's conditional registration was granted in 2003. As such, the groups are calling for an immediate stop-use order on the pesticide while the science is redone, and redesigned in partnership with practicing beekeepers. They claim that the initial field study guidelines, which the Bayer study failed to satisfy, were insufficiently rigorous to test whether or not clothianidin contributes to CCD in a real-world scenario: the field test evaluated the wrong crop, over an insufficient time period and with inadequate controls.

According to beekeeper Jeff Anderson, who has testified before EPA on the topic, "The Bayer study is fatally flawed. It was an open field study with control and test plots of about 2 acres each. Bees typically forage at least 2 miles out from the hive, so it is likely they didn't ingest much of the treated crops. And corn, not canola, is the major pollen-producing crop that bees rely on for winter nutrition. This is a critical point because we see hive losses mainly after over-wintering, so there is something going on in these winter cycles. It's as if they designed the study to avoid seeing clothianidin's effects on hive health."

Clothianidin is of the neonicotinoid family of systemic pesticides, which are taken up by a plant's vascular system and expressed through pollen, nectar and gutation droplets from which bees then forage and drink. Scientists are concerned about the mix and cumulative effects of the multiple pesticides bees are exposed to in these ways. Neonicotinoids are of particular concern because they have cumulative, sublethal effects on insect pollinators that correspond to CCD

symptoms - namely, neurobehavioral and immune system disruptions.

According to James Frazier, PhD., professor of entomology at Penn State's College of Agricultural Sciences, "Among the neonicotinoids, clothianidin is among those most toxic for honey bees; and this combined with its systemic movement in plants has produced a troubling mix of scientific results pointing to its potential risk for honey bees through current agricultural practices. Our own research indicates that systemic pesticides occur in pollen and nectar in much greater quantities than has been previously thought, and that interactions among pesticides occurs often and should be of

wide concern." Dr. Frazier said that the most prudent course of action would be to take the pesticide off the market while the flawed study is being redone.

Clothianidin has been on the market since 2003. With a soil half-life of up to 19 years in heavy soils, and over a year in the lightest of soils, commercial beekeepers are concerned that even an immediate stop-use of clothianidin won't save their livelihoods or hives in time.

"We are losing more than a third of our colonies each winter; but beekeepers are a stubborn, industrious bunch. We split hives, rebound as much as we can each summer, and then just take it on the chin - eat our losses. So even these big loss numbers understate the problem," says 50-year beekeeper, David Hackenberg. "What folks need to understand is that the beekeeping industry, which is responsible for a third of the food we all eat, is at a critical threshold for economic reasons

and reasons to do with bee population dynamics. Our bees are living for 30 days instead of 42, nursing bees are having to forage because there aren't enough foragers and at a certain point a colony just doesn't have the critical mass to keep going. The bees are at that point, and we are at that point. We are losing our livelihoods at a time when there just isn't other work. Another winter of 'more studies are needed' so Bayer can keep their blockbuster products on the market and EPA can avoid a difficult decision, is unacceptable."

Citing the imminent economic and environmental hazards posed by the continued use of clothianidin, the National Honey Bee Advisory Board, Beekeeping Federation, Beyond Pesticides, Pesticide Action Network, North America and Center for Biological Diversity are asking EPA administrator Lisa Jackson to exercise the Agency's emergency powers to take the pesticide off the market.

"The environment has become the experiment and all of us - not just bees and beekeepers - have become the experimental subjects," said Tom Theobald, a 35-year beekeeper. "In an apparent rush to get products to the market, chemicals have been routinely granted "conditional" registrations. Of 94 pesticide active ingredients released since 1997, 70% have been given conditional registrations, with unanswered questions of unknown magnitude. In the case of clothianidin those questions were huge. The EPA's basic charge is "the prevention of unreasonable risk to man and the

environment" and these practices hardly satisfy that obligation. We must do better, there is too much at stake."

Tom Theobald's Article - Do We Have A Pesticide Blowout?

Bee Culture Magazine, July, 2010

(This story is available on Bee Culture's web page here.)

You can listen to a PBS interview about this with Tom here)

I doubt that there are many readers who have escaped reports of the oil well blowout - the explosion and collapse of the Deepwater Horizon drilling platform and the subsequent environmental disaster that has ensued.

Evidence is mounting that the blowout of the Deepwater Horizon was brought on by a climate of lax oversight by the federal agency responsible for 'insuring the safety and environmental protection of offshore drilling operations,' the Mineral Management Service, or MMS. As I've listened to the news and read the articles describing events leading up to the explosion I'm struck by the parallel to what has been occurring in the beekeeping world over the past several years.

In May of 2008 there were massive bee kills in the Baden-Wurttemberg region of Germany, with two thirds of the colonies there killed. The damage was quickly traced to one of the pesticides in the controversial family of neonicotinoids produced by the German corporation Bayer. Planting of corn seed coated with clothianidin, by way of pneumatic planters, supposedly resulted in fugitive clothianidin dust which caused the disaster. Within two weeks Germany banned clothianidin on corn and several other crops, but the damage was done.

Clothianidin is just one of a number of pesticides in the family of neonicotinoids. Neonicotinoids are systemic pesticides, which means that they become incorporated into the system of the plant when the seed germinates. In the United States clothianidin was given a conditional registration by the EPA in 2003. Originally approved for use as a seed coating on corn and canola, it is now being approved for a growing list of other crops as well.

The German bee kill came as no surprise to the beekeeping community, which had been concerned about clothianidin since its registration in the U.S. in 2003, and in Germany in 2004. For four years those concerns were met with repeated assurances of safety, until finally disaster struck in Germany. Even in the aftermath of this huge bee kill the assurances continued. Bayer's explanation was that the bee kill was caused by '... an application error by the seed company which failed to use the glue-like substance that sticks the pesticide to the seed ... It is an extremely rare event and has not been seen anywhere else in Europe ...' This is reminiscent of the finger pointing in the oil industry over the past several weeks.

It appears that two years later we have now had a repeat of this 'rare event,' this time here in the United States. This bee kill occured in Indiana in April, reported by two entomologists at Purdue University in an article written for the Indiana Beekeepers Association newsletter and circulated widely. Titled 'Pesticide Kill at the Purdue Bee Lab?' it reports a significant bee kill across Indiana, again believed to have come from fugitive dust from pneumatic corn planters.

According to these two entomologists 'Every corn seed that goes into the ground in Indiana these days has a coating of clothianidin on it. It has been a dry spring. We have had very warm, windy weather this week. As I watched my neighbor planting, I could see huge clouds of dust being stirred up.' As researchers at a major university, the authors had the resources to do some immediate analysis that would have been beyond the reach of most beekeepers, and they found high levels of clothianidin in the dead bees and the incoming pollen.

Along with other beekeepers, I have been concerned about clothianidin for some time, in part because it is not the first neonicotinoid to cause problems. Imidacloprid, the first, was registered in the U.S. in 1994 and was soon implicated in widespread bee kills. Several commercial beekeepers in North Dakota filed suit because of damage from imidacloprid used on sunflowers and similar damage in France from use on sunflowers led to a ban there in

1999. However it is still used without change in the U.S. France declined to even register clothianidin.

I became concerned about clothianidin in 2007 as the possible cause of a break in the Fall brood cycle I was seeing in my bees and in early 2008 I began digging into the facts surrounding its approval. That story is instructive and cause for great concern I believe.

The first record I found on the consideration of clothianidin comes in the form of an EPA memo dated February 23, 2003, titled 'Risk Assessment for Seed Treatment of Corn and Canola.' To their credit, EPA scientists raised serious concerns in that document and called for strong label language if clothianidin was to be approved for use. They cited the experience in France with imidacloprid as the basis for extreme caution and called for label language which would highlight the dangers. Quite responsibly, they called for a field test of the dangers *prior* to registration:

'The possibility of toxic exposure to nontarget pollinators through the translocation of clothianidin residues that result from seed treatment (corn and canola) has prompted EFED [Environmental Fate and Effects Division] to require field testing that can evaluate the possible chronic exposure to honey bee larvae and queen. In order to fully evaluate the possibility of this toxic effect, a complete worker bee life cycle study must be conducted, as well as an evaluation of exposure and effects to the queen.'

and they called for strong label language as well:

'This compound is toxic to honey bees. The persistence of residues and the expression of clothianidin in nectar and pollen suggests the possibility of chronic toxic risk to honey bee larvae and the eventual stability of the hive.'

This level of concern expressed by EPA scientists in February of 2003 wasn't to last however. In the next memo just two months later, dated April 10, 2003 - an Addendum to the Risk Assessment - EFED retreated. They stuck to their guns on the label language, sort of, but they appear to have been handed their heads by an EPA management that would brook no interference with corporate objectives. 'However, after further consideration ...' is what the scientists had to say after having their attitudes adjusted:

'However, after further consideration, EFED would like to suggest that the registrant be given a conditional registration that is contingent on their conducting the chronic honey bee study that evaluates the sublethal effects of clothianidin over time. EFED will therefore defer the requirement for this bee labeling statement until after the chronic study has been reviewed.'

Bayer was given eight months, until December of 2003, to complete the study, but clothianidin was released to the market and the horses were out of the barn.

It is here, with the April memo, that the regulatory process begins to unravel. The condition of registration, the [chronic] life cycle field study, would go undone for years. 'After further consideration...' meant that the real field test was to take place across the farmlands of America, without control and with serious concerns as to the safety of this pesticide unanswered.

The next memo, which established the final protocols for the field study, is dated March 11, 2004. The original deadline for the field study, upon which the conditional registration had been granted, had already passed three months before. Bayer requested and was granted, retroactively, an extension to complete the field study by May of 2005. All the while however clothianidin would be out on the market and useage would increase rapidly. This has become a common tactic in the corporate playbook, get these products out there by whatever means possible, get agriculture hooked, and then convince farmers they can't live without them.

Previously EPA scientists had clearly stated that any study should be done in the United States, but Bayer was given permission to do it in Canada instead. More significantly, rather than require that the field study be done on

both crops, corn and canola, Bayer was allowed to test only canola, while corn was dismissed with a single sentence. This is significant because in the United States canola is a relatively minor crop, with less than a million acres grown. Corn on the other hand accounts for about 88 million acres. Further, we had just seen a decade of enormous damage to bees from a product called encapsulated methyl parathion, where contaminated corn pollen had been the major vector of damage and EPA scientists were well aware of this. I knew the biologist who signed off on the March, 2004 memo which dismissed corn so casually and he most certainly would have known of the dangers corn pollen could represent, yet Bayer was given a pass and was allowed to disregard corn.

Since clothianidin becomes part of the plant it is expressed in all parts of the plant, thus any insect which chews or sucks on the plant ingests the pesticide and dies. Don't worry though, we were told, it only affects the bad bugs. Besides, it's one of the new 'green' pesticides, derived from a natural substance, nicotine (this is a whole other story, because like many other 'green' pesticides it is a product of heavy chemistry, not nature). It also reduces the need for the application of other, supposedly more toxic pesticides we're told. Neonicotinoids have come under increasing criticism however, not the least of which has been leveled by the beekeeping industry and others for the alleged detrimental effects on honey bees and other pollinators.

The word 'alleged' could start the fight I suppose, because critics believe the case against the neonicotinoids is complete and compelling. On the other hand, Bayer, and apparently the EPA, would have us believe otherwise. Much of the evidence is in the public arena now, and with the publication of this article, the conduct of the EPA, revealed through its own documents, will be as well. The readers can judge the evidence for themselves and draw their own conclusions. I'm presenting my view of the goings on and that can be part of your consideration. Obviously, I'm not without my own opinions in these matters.

The official life cycle study was to languish for years. In March of 2004 the initial deadline for the study had passed and the EPA granted Bayer an extension, until May of 2005, allowing further that if accurate data could not be produced in the summer of 2004, the study might be extended yet again, through the 2005 growing season. According to its own records, dated March 11, 2004, the EPA says 'EFED wants usable data to decide the potential adverse effects to bees from clothianidin's seed treatment use and opposes rushing the study and having deficient information.'

While this may seem to evidence concern, you must remember that this would mean a pesticide with serious questions as to its environmental consequences could then have been on the market and in wide use for three full growing seasons without any answers to those questions. While there may have been concern about rushing the study, there seemed to be no comparable concern about rushing an untested pesticide onto the market. These tests should have been completed before clothianidin was ever registered, as EPA scientists had initially recommended.

Then in May of 2008 we have the German incident – two thirds of the colonies in the Baden-Wurttemberg region killed, with 99% of the dead bees showing high levels of clothianidin. Within two weeks of this incident Germany had suspended the registration for clothianidin and this action was soon followed by bans in Italy and Slovenia. And what came from regulators in the U.S.? Silence. Worse than silence actually, because it soon began to appear that the EPA was going into hiding.

It was in the Spring of 2008, before the German incident, that I began investigating clothianidin. I did so because the previous Fall I had discovered that there was a break in the Fall brood cycle in nearly all of my colonies, and when I tried to match the symptoms to some known or suspected cause, the trail led to clothianidin.

I wasn't the only one who was concerned about pesticides. In the Fall of 2006 Pennsylvania beekeeper David Hackenberg had broken the story of huge bee losses, what would come to be called Colony Collapse Disorder, or CCD. Dubbed the great mystery by many researchers, over time more and more beekeepers began to believe that there was little mystery and that pesticides were a major ingredient in CCD.

The Natural Resources Defense Council had begun questioning the safety of clothianidin and subsequent to the incident in Germany asked the EPA to provide the long awaited life cycle study, which was by now four years overdue. The EPA failed to respond so the NRDC filed a Freedom of Information Act request. The EPA failed to respond once more and on August 18, 2008 the NRDC filed suit for the study.

It was just prior to the NRDC suit that I discovered the infamous missing study; the internet can be an amazing resource if you just keep digging and prying. Within a month of my discovery the EPA had put their review and approval of the study on their web site, apparently flushed out by the NRDC lawsuit. What the review does and doesn't reveal is disturbing.

Let me first put the study in a more agricultural context, and then look at it more closely. Let's say you had a noxious weed that was affecting your cattle and you wanted to assess the dangers. So you plant two and a half acres of the suspect weed in the middle of 2000 acres of lush Wyoming grassland and put four cows on the test plot. The cows aren't fenced in, however, and are free to roam over the entire 2000 acres. What do you think is going to happen? How long do you think your four cows are going to stay on your dinky little test plot? How significantly is that noxious weed going to be represented in their diet? I think you know the answers.

Here's what the life cycle study of bees and canola consisted of: four colonies of bees were set in the middle of one hectare (2½ acres) of canola planted from treated seed, with the bees free to forage over thousands of surrounding acres in bloom with untreated canola, which they most surely did. What do you think the results were? They were exactly what Bayer wanted of course.

Why was the chronic life cycle study and the EPA's review unavailable? Was it ineptitude? Perhaps it was simply embarrassment, because the study had been completed on August 1, 2006, already long overdue, and yet despite all the controversy had not been reviewed by the EPA until November 16, 2007, nearly a year and a half later, after clothianidin had been on the market for five full growing seasons.

Perhaps it was because in the opening paragraph of its review the EPA states unequivocally 'This study is scientifically sound and satisfies the guideline requirements for a field toxicity test with honeybees (OPP Gdln. No. 141-5; OPPTS 850.3040).' Scientifically sound? If you're in 4th grade perhaps, but certainly not if you have a Phd after your name. They should be embarrassed, this makes a mockery of science.

Further concerns are emerging as a consequence of the Indiana bee kill. High levels of atrazine were found in the dead bees and pollen along with clothianidin. This suggests that dust alone may be a vector, with the atrazine contamination coming from airborn soil. We now find evidence, again from the EPA's own documents, that clothianidin can be persistent in the soil, remaning for years in some cases, and that it may accumulate from successive uses of treated seed, a common practice in the corn belt. Has the soil itself become a source of toxicity as a consequence of clothianidin use? Only further tests will give us answers to those questions.

What are we to do with circumstances like these? It is simply nuts, and yet this bogus science has now been used as justification to approve the use of clothianidin on a rapidly growing roster of other crops while there is mounting evidence of problems coming from around the globe. The EPA still seems to lack any sense of urgency and says it will not review clothianidin until 2012.

I still believe that most of the working level people at the EPA want to do things right, but there seems to be a serious management failure and nobody seems to be stepping in to get the ship back on course. Some very spooky chemicals are coming onto the market without proper testing and once out are virtually unregulated. We are seeing the legacy of more than a decade of deregulation and self regulation and it has not worked.

This is the Deepwater Horizon in agriculture. America's farmland is awash in these questionable chemicals as surely as the shorelines of the Gulf Coast are awash in crude oil, and for many of the same reasons.

The bees are telling us something. We need to start listening before it's too late.

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Fw: Questions on clothianidin registration

Meredith Laws Or. Thomas Steeger, Thomas Moriarty, Venus Eagle, Kable Davis

12/09/2010 07:05 AM

Just fyi to ------\Sent by EPA Wireless E-Mail Services.

From: Meredith Laws

Sent: 12/09/2010 07:03 AM EST **To:** Lois Rossi; George Herndon

Subject: Fw: Questions on clothianidin registration

Please see below. I assume Dale will take care of this? Otherwise, I do not think I am the right person to be interviewed.

to -----\Sent by EPA Wireless E-Mail Services.

From: "Tom Philpott" [tphilpott@grist.org]

Sent: 12/08/2010 03:36 PM PST **To:** Dale Kemery; Meredith Laws

Subject: Questions on clothianidin registration

Dear Ms. Laws,

I'm working on a story about controversy surrounding the registration of clothianidin. As you must know by now, an internal EPA document, dated Nov. 2, has surfaced, authored by EPA employees DeCant and Barret, expressing serious concern about the risk posed by clothianidin to honeybee populations. Most notably, the document states that the authors had downgraded Bayer's study exonerating clothianidin as a threat to bee populations, from "accepted" to "supplemental."

I'm writing to request an interview with you concerning clothianidin's status in light of this new information. Please let me know when you have time.

Thanks, Tom Philpott

Tom Philpott

Senior writer, food and agriculture, Grist Magazine Grist page: http://www.grist.org/people/Tom+Philpott

Twitter: http://twitter.com/#!/tomphilpott

828 963 5317



clothianidin

Anita Pease o Thomas Steeger

12/09/2010 10:56 AM

History:

This message has been forwarded.

Attached is the memo classifying the bee field study as invalid.



044309 D383634 study reclassification memo.docx

Anita Pease Senior Biologist USEPA/OPP/EFED/ERB6 1200 Pennsylvania Ave. NW (7507P) Washington, DC 20460 Phone: 703-305-0392

Fax: 703-305-6309